

Remarks

This Application has been carefully reviewed in light of the Office Action mailed July 14, 2004. Claims 1-35 are pending in the present application. The Examiner rejects Claims 1-35. Claims 1, 15, 26 and 31 have been amended to further clarify what the inventors believe to be the invention. Claims 13 and 24 have been amended to capitalize the trademarked term "ORACLE." Claim 3 has been cancelled without prejudice or disclaimer. Thus, Claims 1-2 and 4-35 are currently pending. Applicants respectfully request reconsideration and favorable action in this case.

Applicants have addressed the Examiner's objections to the Specification.

The Examiner has noted the use of various trademarked terms in the Specification, and indicated that such terms should be capitalized and accompanied by the generic terminology. To address the Examiner's comments, Applicant has amended the Specification and Claims 13 and 24, as shown above.

Claims 1-2 and 4-33 are Allowable over the proposed *Krishna-Williams* combination.

The Examiner rejects Claims 1-35 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,412,804 issued to Murali M. Krishna ("Krishna") in view of U.S. Patent No. 6,735,593 issued to Simon Guy Williams ("Williams"). Applicants respectfully disagree.

Krishna discloses an alternative method of un-nesting nested query blocks with equi-join predicates and a "COUNT" aggregate between the nested blocks. (col. 3, lines 19-22). The method extends the semantics of the outer join operator to permit the application of different predicates to the join tuples and the anti-join tuples. (col. 3, lines 24-27). *Krishna* also discloses a novel alternative method of un-nesting queries with multiple blocks. (col. 3, lines 29-31). This alternative method is used when the correlation predicates in the Count block are "neighbor predicate" referencing the relation in their own block and the relation from the immediately enclosing block. (col. 3, lines 31-35). Otherwise, the Ganski-Dayal un-nesting method is used. (col. 3, lines 35-36).

Williams discloses a database architecture useful for storing data in versatile formats that can be utilized by a wide range of software applications. The architecture enables data to be entered as a number of entities, a number of nexuses between the entities, and a number of nexuses between nexuses and entities. (Abstract).

The proposed *Krishna-Williams* combination fails to disclose, teach or suggest all of the limitations recited in amended Claim 1. For example, the proposed *Krishna-Williams* combination fails to disclose, teach or suggest “performing partial denormalization by replicating frequently searched data of said hierarchical data into [a] driving table,” as specifically recited in amended Claim 1. According to the Examiner, “*Krishna* teaches performing partial denormalization by replicating frequently searched information into said driving table (see col. 6, lines 19-25 et seq, *Krishna*).” (Office Action, page 4, regarding Claim 3). However, the portion of *Krishna* cited by the Examiner merely discloses:

“The query is a string of alphanumeric characters which conform to a query language that identified data in the relational database and operations to perform upon the data. In many conventional query languages, the query is in the form of a query block, which may refer to additional nested query blocks, as will be further described below.” (*Krishna*, col. 6, lines 19-25).

This passage clearly does not disclose, teach or suggest “performing partial denormalization” at all, much less “performing partial denormalization by replicating frequently searched data of said hierarchical data into [a] driving table,” as recited in amended Claim 1. Moreover, nowhere in either *Krishna* or *Williams* is this limitation disclose, taught or suggested. Indeed, neither *Krishna* or *Williams* even mention or imply performing denormalization or replicating data into a driving table. For at least these reasons, the proposed *Krishna-Williams* combination fails to disclose, teach or suggest all of the limitations recited in amended Claim 1.

Thus, for at least these reasons, Applicants respectfully request reconsideration and allowance of amended Claim 1, together with Claims 2 and 4-14 that depend from Claim 1. In addition, for analogous reasons, the cited references fail to disclose, teach, or suggest all of the limitations recited in amended independent Claims 15, 26 and 31. Therefore, Applicants respectfully request reconsideration and allowance of amended Claims 15, 26 and 31, together with Claims 16-25, 27-30 and 32-35 that depend from Claims 15, 26 and 31.

Conclusion

Applicants have made an earnest attempt to place this case in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request full allowance of all pending claims.

If the Examiner feels that a telephone conference would advance prosecution of this Application in any manner, the Examiner is invited to contact Christopher W. Kennerly, Attorney for Applicants, at the Examiner's convenience at (214) 953-6812.

The Commissioner is hereby authorized to charge any additional fees or credit any overpayment to Deposit Account No. 02-0384 of BAKER BOTTS L.L.P.

Respectfully submitted,

BAKER BOTTS L.L.P.
Attorneys for Applicants



Eric M. Grabski
Reg. No. 51,749

Date: October 14, 2004

Correspondence Address:

Customer Number: **05073**